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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

EXXON MOBIL CORPORATION,

Petitioner/Plaintiff,

v.

SANTA BARBARA COUNTY  
BOARD OF SUPERVISORS,

Respondent/Defendant,

and

ENVIRONMENTAL DEFENSE  
CENTER, GET OIL OUT!, SANTA  
BARBARA COUNTY ACTION  
NETWORK, SIERRA CLUB,  
SURFRIDER FOUNDATION,  
CENTER FOR BIOLOGICAL  
DIVERSITY, and WISHTOYO  
FOUNDATION,

Proposed Defendant-  
Intervenors.

Case No. 2:22-cv-03225(DMG MRWx)

**DECLARATION OF MICHAEL  
LYONS IN SUPPORT OF  
MOTION TO INTERVENE**

Hon. Dolly Gee

Hearing: October 21, 2022

Time: 9:30 a.m.

Place: Courtroom 8C,  
350 West 1st Street, Los Angeles

1 I, Michael Lyons, declare as follows:

2 1. My name is Michael Lyons. I am over 18 years old. I have personal  
3 knowledge of the following facts and if called as a witness, would testify to these  
4 facts under oath.

5 2. I currently live in Santa Barbara and have lived in Santa Barbara  
6 County for 53 years.

7 3. I have been a member of Get Oil Out! for 23 years; I remain a  
8 current member and am the current Board president.

9 4. Founded in response to the devastating 1969 Santa Barbara Oil Spill,  
10 Get Oil Out!'s mission for the past 50 years has been to rid the Santa Barbara  
11 Channel of existing oil development and to prevent any new oil projects from  
12 being approved in order to prevent oil spills and any other environmental  
13 degradation in the Santa Barbara Channel and surrounding region. As provided  
14 in our bylaws, Get Oil Out's purpose includes preserving and conserving Santa  
15 Barbara's unique natural environment, scenic beauty, and resources by opposing  
16 offshore and onshore fossil fuel development which pose a significant danger to  
17 that environment.

18 5. I am an avid outdoorsman and I frequently use and recreate directly  
19 in and around the area where the oil trucks will be operating. My uses in this area  
20 consist of surfing, bike riding, running, hiking, fishing, swimming, bird watching,  
21 camping, star gazing, photography, mobile working, driving and picnicking, to  
22 name a few. Specifically, I regularly use and enjoy the Naples coastal bluffs and  
23 trails, El Capitan State Park/Beach, Refugio State Park/Beach, Gaviota State Park  
24 and Beach, Gaviota Peak, and Nojoqui Falls Park.

25 6. I regularly drive where the oil trucks will be operating along  
26 Highway 101. I do not think the highway where the oil trucks are operating can  
27 support the additional traffic.  
28

1           7. If ExxonMobil's project were allowed to proceed, the additional use  
2 of Highway 101 and Route 166 for trucking oil would cause an increase in traffic  
3 and accidents that would hinder my ability to enjoy, use, and recreate in and  
4 around the areas of concern. I am also very concerned for my own safety and for  
5 the safety of my family, friends and community members that also recreate along  
6 and use these highways. I fear that the increased highway use for oil trucking  
7 creates unnecessary danger and potential harm to me directly and all who use the  
8 highway. I share this concern personally and on behalf of Get Oil Out!.

9           8. The trucking of oil on the local highways as was proposed is exactly  
10 the sort of activity that Get Oil Out! opposes. The threat and danger to the  
11 surrounding environment and community is severe and certain.

12           9. Get Oil Out! retained the Environmental Defense Center to represent  
13 our organization in opposing the ExxonMobil trucking project before the  
14 Planning Commission and Board of Supervisors. On behalf of Get Oil Out!, EDC  
15 submitted detailed comments at every stage of the environmental review and  
16 administrative process detailing our concerns about the project and urging its  
17 denial. In addition, I also personally attended and testified at hearings.

18           10. Get Oil Out! seeks to intervene in ExxonMobil's lawsuit challenging  
19 the County's denial of its trucking proposal. Get Oil Out! members' interests and  
20 my personal and professional interests are specifically threatened because the  
21 proposed oil trucking would increase the risk of oil spills, harm to wildlife,  
22 waters, and cultural resources and lead to more accidents. A court order  
23 upholding Santa Barbara County's decision will ensure the safety of its residents  
24 and protection of the environment and would make me feel personally much  
25 safer. If the decision is not upheld, drivers and our local environment will be put  
26 at considerable risk from traffic accidents and oil spills, which would decrease my  
27 own use and enjoyment of the area.

1 I declare under penalty of perjury that the foregoing is true and correct to  
2 the best of my knowledge, information, and belief.

3 Executed at Santa Barbara, California, on August 25, 2022.

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6 Michael Lyons, President – Get Oil Out!  
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